

# **Exhibit C**



UNITED STATES OF AMERICA  
**FEDERAL TRADE COMMISSION**  
WASHINGTON, D.C. 20580

Michael J. Turner | Attorney  
Anticompetitive Practices I Division  
Bureau of Competition  
202.326.3649  
mtturner@ftc.gov

June 5, 2024

**VIA ELECTRONIC MAIL**

Matthew Dowd  
Dowd Scheffel PLLC  
1717 Pennsylvania Avenue, NW  
Suite 1025  
Washington, D.C. 20006  
mdowd@dowdscheffel.com

Re: *FTC et al. v. Syngenta Crop Protection AG et al.*, No. 1:22-cv-00828-TDS-JEP  
(M.D.N.C.)

Dear Matt:

This letter recounts our June 4, 2024, meet-and-confer discussion regarding Atticus' response to Plaintiffs' April 23, 2024, documents subpoena ("Subpoena") in the above captioned matter. As part of that conversation, we discussed the responses and objections that Atticus submitted on May 28, 2024.

We discussed the definitions of Active Ingredient, Bayer, Collaborative Work Environment, Corteva, Covered Crop Protection Products, and Syngenta, and we confirmed that we are on the same page. To the extent that applying a Subpoena definition—for example Collaborative Work Environment—is unduly burdensome to Atticus, you will raise the issue and we will discuss how to mitigate such burden.

We discussed each of the Subpoena requests. With respect to the data requests (Specifications 2–9), you agreed to speak with your client about what responsive data Atticus possesses and the burden with producing that data as specified. You agreed to a similar process for the balance of requests related to documents, and I said we would be willing to discuss limiting document requests by custodian or other means if it would help Atticus avoid undue burden.

I asked you to produce an organizational chart (Specification 1) as soon as possible so that we could discuss custodians and sources of responsive documents within Atticus. I also asked that Atticus plan to produce documents on a rolling basis, and that Atticus prioritize the production of responsive data.

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You requested an extension of the Subpoena return date to allow Atticus to continue to respond to the Subpoena and for us to continue conferring regarding Atticus' response. Accordingly, the Subpoena return date is extended to **July 12, 2014**.

\* \* \*

We agreed to confer again during the week of June 17. If you have questions or concerns prior to our next discussion, please call me at 202.326.3649 or email at [mturner@ftc.gov](mailto:mturner@ftc.gov).

Sincerely,

/s/ Michael J. Turner  
Michael J. Turner  
Attorney